

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KAREN SCOTT,

Plaintiff,

-against-

WPIX, INC.,

Defendant.

10 CV 4622 (WHP)

**PLAINTIFF'S PROPOSED VOIR DIRE**

A. Personal Background – Education and Employment

- a. What is your educational background?
- b. What is your business/occupation?
- c. What company do you work for?
- d. What is your job title?
- e. What does that work involve?
- f. How many years have you worked there?
- g. Family background
  - i. Who do you live with?
  - ii. If spouse/significant other, is your spouse employed?
  - iii. Where does your spouse work?
  - iv. What kind of work does your spouse do?
  - v. Children? If so, do any of your children work?
  - vi. Where do they work?
  - vii. What type of work do they do?

B. Personal Experiences – Trials

- a. Have any of you previously served on a jury of any kind, either in state or federal court, in either a civil or criminal trial?
  - i. If so, state where, when, and what type of case?
- b. Have you or any member of your immediate family ever filed a claim against anyone for damages?
  - i. If so, what type of claim? Result?
  - ii. Would that experience influence you in any way in reaching a fair and impartial verdict in this case?
- c. Have you ever been a witness in a lawsuit?
  - i. If so, state where, when, and what type of case?

C. Personal Experiences – Employment Disputes

- a. Have you or any of your immediate family members ever been terminated from employment or demoted to a different job?
  - i. If so, who was the employer?
  - ii. When did this occur?
  - iii. What were the circumstances of that termination or demotion?
  - iv. Did you think that termination or demotion was fair?
  - v. Would that experience influence you in any way in reaching a fair and impartial verdict in this case?
- b. Have you ever felt that you, a family member, or close friend was discriminated against by an employer? If yes:
  - i. On what basis do you believe you or your family member were discriminated against (race, color, religion, age, sex, national origin, etc.)?

- ii. What made you feel that you had been discriminated against?
- iii. Did you or your family member ever file a lawsuit or charge with a government agency or court because of the suspected discrimination?  
What was the result?
- iv. Would that experience influence you in any way in reaching a fair and impartial verdict in this case?

D. Knowledge of the Case, Parties, Attorneys or Witnesses

- a. The plaintiff in this case is Karen Scott. Do any of you know Ms. Scott or have reason to believe any of your family or close friends know or have worked with Ms. Scott?
  - i. If so, please explain.
- b. The defendant in this case is WPIX, Inc. Do any of your family members or close friends work for WPIX, Inc.?
  - i. If so, please explain.
- c. WPIX, Inc.'s parent company is the Tribune Company. Do any of your family members or close friends work for Tribune?
  - i. If so, please explain.
- d. Ms. Scott is represented by Ken Rubinstein and Sarah Jacobson of the law firm Haynes and Boone LLP. The defendant in this case is represented by Edward Cerasia II, Anjanette Cabrera, and Allison Ianni of the law firm Ogletree Deakins. Do you know any of these attorneys?
  - i. If so, explain.
- e. The following individuals may be witnesses in this lawsuit:
  - i. Betty Ellen Berlamino

- ii. Steve Charlier
  - iii. Jean Maye
  - iv. Lauren Petterson
  - v. Myrna Ramirez
  - vi. Steve Schussel
  - vii. Marvin Scott
  - viii. Kaity Tong
  - ix. John Houseman
  - x. John Seminierio
  - xi. Will Surat
  - xii. John Zeigler
  - xiii. Cathy Davis
  - xiv. Jessica Belucci
- f. Do you know any of these individuals or have reason to believe any of your family members or close friends may know them?
- i. If so, which of these individuals do you know?
  - ii. How do you know them?
  - iii. Would your acquaintance with this individual in any way affect any decision you may be required to make as a juror?
- g. Do you know the names of any of these individuals from television?
- i. If so, will the fact that you recognize any of these individuals from television in any way affect any decision you may be required to make as a juror?

E. Possible Prejudices

- a. Do any of you feel that there are too many lawsuits today or that most lawsuits lack merit?
  - i. If so, explain.
  - ii. Would that belief influence your ability to follow the Court's instructions or render a fair and impartial verdict in this case?
- b. Would any of you have trouble awarding damages for emotional anguish if proven by Ms. Scott?
  - i. If so, explain.
- c. Would any of you have trouble awarding punitive damages or damages designed to punish WPIX if proven by Ms. Scott?
  - i. If so, explain.
- d. In this case, Betty Ellen Berlamino, the person principally charged with carrying out the discriminatory acts, has also been terminated from employment. Will that fact influence your ability to follow the Court's instructions or render a fair and impartial verdict in this case?
- e. Does the fact that Ms. Scott's lawsuit involves a claim by an individual against a corporation influence you or cause you to be sympathetic to one side or the other?
- f. This is an age discrimination case where Ms. Scott alleges she was discharged from employment with defendant because of her age. Is there any reason that the nature of this case would affect your ability to render a fair and impartial decision?
  - i. If so, explain.

- g. Is there anything else that you can think of that would prevent you from being impartial in this case?

Dated: July 16, 2012

HAYNES AND BOONE, LLP  
*Attorneys for Plaintiff*

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